

In the Matter Of:

MELVIN NEAL, JR. V.

HINDS COUNTY, MISSISSIPPI, ET AL

3:18-CV-590-CWR-FKB

VICTOR MASON

October 02, 2020



1st in Reporting, 1st in Service, 1st in Technology

We Bridge the State and Cover the Nation!

www.alphareporting.com

800-556-8974

Victor Mason - October 02, 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MELVIN NEAL, JR.

PLAINTIFF

V.

CAUSE NO. 3:18-CV-590-CWR-FKB

HINDS COUNTY, MISSISSIPPI, SHERIFF
VICTOR P. MASON, IN HIS OFFICIAL
CAPACITY, LIEUTENANT ANTONY SIMON,
IN HIS INDIVIDUAL AND OFFICIAL
CAPACITY, SERGEANT JAMIE CASTON,
IN HIS INDIVIDUAL AND OFFICIAL
CAPACITY, AND SERGEANT JOHN SCOTT,
IN HIS INDIVIDUAL AND OFFICIAL CAPACITY

DEFENDANTS

DEPOSITION OF VICTOR MASON

Taken at the instance of the Plaintiff on Friday,
October 2, 2020, by videoconference via Zoom, all parties
attending via Zoom, beginning at 1:48 p.m.

(Appearances noted herein)

REPORTED BY: Courtney R. Taylor, CCR, TLC
Alpha Reporting Corporation
236 Adams Avenue
Memphis, Tennessee 38103

Alpha Reporting Corporation

1 APPEARANCES:

2 MICHAEL S. CARR, ESQ.
3 Carr Law Firm, PLLC
4 301 West Sunflower Road, Suite D
5 Cleveland, Mississippi 38732

6 COUNSEL FOR PLAINTIFF

7 KATELYN A. RILEY, ESQ.
8 Allen, Allen, Breeland & Allen
9 214 Justice Street
10 Brookhaven, Mississippi 39601

11 COUNSEL FOR DEFENDANTS
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

Style and Appearances.....	1-2
Index.....	3
Examination by Mr. Carr.....	4
Certificate of Deponent.....	21
Certificate of Reporter.....	22

1 THE REPORTER: As the court reporter, I
2 need to confirm that all counsel present are
3 willing to stipulate that I can administer
4 the oath via videoconference.

5 MR. CARR: Agreed.

6 MS. RILEY: Agreed.

7 VICTOR MASON,
8 having first been duly sworn, was examined and
9 testified as follows:

10 EXAMINATION BY MR. CARR:

11 Q. Please state your name for the record, sir.

12 A. Victor P. Mason.

13 Q. All right. And, Mr. Mason, my name is
14 Attorney Mike Carr. I am an attorney for Melvin
15 Neal, who has filed a lawsuit against Hinds County
16 and yourself and some of -- in your capacity as
17 sheriff and some individual officers. I don't have
18 many questions for you today, sir.

19 But have you given a deposition before?

20 A. Yes, I have.

21 Q. I imagine as the sheriff.

22 How many depositions have you given? Do
23 you think?

24 A. Hundreds.

25 Q. Okay.

1 A. I mean, in my capacity, what you expect,
2 right?

3 Q. Well, some sheriffs take more depositions
4 than others. I don't know.

5 A. Yeah.

6 Q. You know -- so you understand how
7 depositions work. I don't know if you've done a
8 Zoom deposition before, but it's the same format.
9 I'm going to ask some questions, and then just wait
10 until I get to the end of my question. And then you
11 would, respond clearly, so the court reporter gets
12 down all that we talk about today.

13 Is that fair?

14 A. That's fair.

15 Q. Very good.

16 Now, Mr. Mason, when was your term as
17 sheriff for Coahoma -- for -- not Coahoma -- for
18 Hinds County?

19 A. It started January of 2016 and ended this
20 year, of January -- well, actually, the end of
21 December of last year.

22 Q. December of '19?

23 A. Correct.

24 Q. So you avoided the pandemic as sheriff,
25 right?

1 A. Yes, I did.

2 Q. Okay. And this incident happened on
3 December 28th, 2017.

4 Have you had an opportunity to review any
5 paper documents associated with this claim?

6 A. No, I haven't, but I do know that Internal
7 Affairs was assigned to it. We had an investigator
8 assigned to it.

9 Q. Okay. Have you read the complaint in this
10 case or any of the incident reports?

11 A. No, I haven't.

12 Q. All right. Have you read the Internal
13 Affairs report?

14 A. I can't recall that one, because we have so
15 many.

16 Q. Sure.

17 So the Internal Affairs report for
18 Mr. Neal's allegation, the December 28, 2017,
19 report, you haven't looked at that, correct?

20 A. No. No, I haven't.

21 Q. Do you have any independent recollection of
22 this incident, this alleged use of force by Melvin
23 Neal against -- or -- sorry -- alleged use of force
24 that Melvin Neal alleges your three officers used
25 against him?

1 A. No.

2 Q. Okay. As sheriff, what is your ability or
3 your power to make policy for the sheriff's
4 department?

5 A. Well, I'm in charge of the whole
6 organization. And I, along with others, have to
7 draft policies, general orders, especial orders, and
8 we just have to do it all together.

9 Q. Okay. And what tools do you use to
10 determine how to draft, let's say, a Use of Force
11 policy?

12 How did you do that when you formulated it
13 between 2016 and the end of 2019?

14 MS. RILEY: Objection to the question.

15 But you can answer.

16 A. We just go on past experience and who we
17 have working.

18 Q. (By Mr. Carr) Okay. Is it fair say you
19 take a policy of your predecessor, review it, and
20 then tweak it or revise it as you see fit --

21 A. Yes.

22 Q. -- I mean, consistent with your standards
23 and training?

24 A. Yes.

25 Q. All right. And I'm sure you get some legal

1 advice in there somewhere, correct?

2 MS. RILEY: Objection to the question.

3 But you can answer.

4 A. It's reviewed.

5 Q. (By Mr. Carr) Okay. Now, right when you
6 came into office, the -- which was a January of '16,
7 right --

8 A. That's correct.

9 Q. -- all right -- just seven months earlier
10 the Civil Rights Division of the U.S. Department of
11 Justice had issued a letter -- a detailed letter
12 regarding an investigation that they been conducting
13 of the Hinds County Adult Detention Center for a
14 period of time involving the administration of your
15 predecessor.

16 Is that correct?

17 A. That's correct.

18 Q. Are you familiar with that letter?

19 A. I'm familiar with the investigation.

20 Q. Okay. The investigation. And I'm not
21 going to ask you specifics about the letter, and I
22 -- you probably don't even have it in front of you.

23 But tell me generally what you, as the
24 sheriff, did to come into compliance with the
25 requirements of the U.S. Department of Justice and

1 improve conditions at the Hinds County Adult
2 Detention Center?

3 MS. RILEY: I'm going to object to this.

4 But you can answer.

5 A. We tried to go into compliance with what
6 they wanted the best we could with the budget we
7 had.

8 Q. (By Mr. Carr) Okay. Did you -- as the
9 sheriff, as you sit here today, can you think of any
10 findings they made that you objected to and you said
11 that we weren't going to get into compliance with?

12 A. I --

13 MS. RILEY: Obj- --

14 A. -- I --

15 MS. RILEY: -- -ection.

16 But you --

17 A. -- I --

18 MS. RILEY: -- can answer.

19 A. -- I didn't object to any of their
20 findings.

21 Q. (By Mr. Carr) Okay.

22 A. I had to do what they requested.

23 Q. Well, I understand you had to do it. I was
24 asking if you objected to having to do it?

25 A. No.

1 MS. RILEY: Objection.

2 But you can answer.

3 Q. (By Mr. Carr) Okay. Because sometimes you
4 get told you have to do something that you don't
5 think, you know, you should have to do in certain
6 situations. I was just wondering if that happened
7 with the DOJ report.

8 But you were generally okay with --

9 Well, strike that.

10 You made efforts, through your sheriff's
11 department, to come into compliance with the civil
12 rights division requests -- or findings, correct?

13 A. Correct.

14 Q. All right. And by the time that you left
15 office in December of '19, would you say that you
16 came into compliance?

17 MS. RILEY: Objection.

18 But you can answer.

19 A. Not fully, but we tried.

20 Q. (By Mr. Carr) All right. Tell me -- flush
21 that out for me some, and I understand this isn't
22 something you can just do overnight. Because it's
23 not a --

24 A. Right.

25 Q. -- it's not a problem that was created

1 overnight, you know. These are things that take a
2 while to do and take a lot of money to do.

3 My question, I guess, is: When you were
4 coming out of office, can you think of any things
5 that were undone that you were trying to do to come
6 into compliance with the civil rights findings?

7 A. Staffing was one of the problems.

8 Q. And describe that for me.

9 A. Staffing, people, jailers, detention
10 officers. We tried to recruit the best we could,
11 because, according to their standards, they wanted
12 400-plus, and there's no way you're going to get
13 that, not for Hinds County. So we tried our best.

14 Q. So you tried to increase the number of
15 certified corrections officers at the Hinds County
16 Adult Detention Center, correct?

17 A. Correct.

18 Q. And is it fair to say you weren't given the
19 budget to have 400 certified corrections officers at
20 the Hinds County Adult Detention Center?

21 A. Yes.

22 Q. All right. Even if you had the budget, do
23 you think you could have found 400 certified
24 corrections officers for the Hinds County Adult
25 Detention Center?

1 MS. RILEY: Objection.

2 But you can answer.

3 A. Well, when you have people that can't pass
4 the background -- and detention isn't made for
5 everybody, and then you have other agencies that pay
6 more than you, it's fair to say that.

7 Q. (By Mr. Carr) Okay. Okay. In addition to
8 chronic understaffing, what other problems that you
9 were unable to, by your term as sheriff, come into
10 compliance with that come to mind?

11 A. Well, we tried to repair the problem in the
12 jail with the locks, because the door wouldn't lock.
13 And that was --

14 Q. Right.

15 A. -- a problem, but that was really the first
16 two problems.

17 Q. Okay. And did that have to do with the age
18 of the facilities?

19 A. Yes.

20 Q. Okay. The investigation found that the
21 jail failed to protect prisoners from serious harm
22 under the Eighth Amendment.

23 I'm sorry about that loud noise, Sheriff.
24 My office is right at the highway, and we've got a
25 bunch of good ole boys with loud pipes that like to

1 run up and down the highway on a Friday, making a
2 lot of noise. So I'm trouble -- I'm sorry if you
3 have trouble hearing.

4 The investigation found that the Hinds
5 County Adult Detention Center failed to protect
6 prisoners from serious harm.

7 What steps can you annunciate that y'all
8 took to remedy that?

9 A. We tried to hire more staff as best we
10 could.

11 Q. Okay.

12 A. And we tried to get the locks repaired. In
13 fact, they started repairing them before I left.

14 Q. All right. What efforts did you make to
15 control contraband, or what changes did you make to
16 control the influx of contraband in your jail after
17 th- --

18 A. We --

19 Q. -- -is report came out?

20 A. Well, we stepped up our searches when -- in
21 booking and even in the front of the entrance, where
22 the employees would come in. That's how -- we
23 arrested several of them, so we stepped up our
24 efforts on that.

25 Q. Okay. Give me some details as to how you

1 did that. Like what would you do versus the
2 policies of your predecessors to really crack down
3 on contraband with the budget that you had?

4 A. Well, we could conduct shakedowns weekly,
5 if not, every other week, and they were unannounced.
6 Nobody knew, not even the warden, at some point.

7 Q. Uh-huh. Okay. Did you ever bring in any
8 outside agencies to conduct shakedowns? Like I know
9 here at Bolivar, sometimes they'll bring in the
10 marshall or some other independent agency to conduct
11 shakedowns.

12 Did your agency -- did your jail ever do
13 that? And you --

14 A. Yes, we -- yes, I did.

15 Q. Okay. What other agencies would -- came in
16 to conduct any shakedowns of your jail during your
17 time as sheriff, sir?

18 A. The agencies that assisted us was the
19 Mississippi Department of Corrections, the
20 Mississippi Highway Patrol Special Operations group,
21 Clinton Police Department, and I believe that's it.

22 Q. Why does bringing in an outside agency to
23 conduct a shakedown help?

24 A. Well, you have the manpower.

25 Q. All right. Is it also because you don't

1 trust your own corrections officers to perform a
2 shakedown?

3 A. No, I'm not going to say that, but I just
4 like manpower.

5 Q. Okay. Okay. Next, the Department of
6 Justice found that prisoners have suffered actual
7 harm from the improper use of force. And just so
8 I'm clear on the record, I'm referencing page 12 of
9 the DOJ report.

10 Now, again, I know you may not be familiar
11 with the actual letter or have read it recently.
12 Can you tell me any steps -- or -- any steps that
13 y'all took to remedy the allegation or the finding
14 that prisoners have suffered actual harm from the
15 improper use of force by your own staff --

16 A. Well, we --

17 Q. -- the 2015 staff? Sorry, it's not your
18 staff.

19 A. Okay. Well, we had -- we stepped up
20 efforts on training we -- like tasers, so you
21 wouldn't have to physically use much force. And,
22 like I said, we tried to step up efforts on
23 recruiting more people.

24 Q. Okay. So you found that because of --
25 would it -- is it safe to say that if the jail was

1 understaffed, then the officers may use force versus
2 if they had more people there, they wouldn't use
3 force?

4 Is that what you're saying?

5 A. I think if you had more people there, it
6 would help, because, number one, the guys were
7 outnumbered either way. But I think if you had more
8 people -- because the way the jail is designed, it
9 would be a deterrent.

10 Q. Okay. Can you describe for me what you
11 would do, as sheriff, to train your employees in use
12 of force, when to put hands on somebody, when not
13 to?

14 What kind of training would they get?

15 A. Well, the training they were getting --
16 because we were doing it anyway -- was physical
17 training, takedown holds, come-along holds, things
18 like that. And, as I said, we also added tasers to
19 the, you know -- the officers that wanted to come
20 in.

21 Q. Okay. And just so we're clear, Sheriff, in
22 this particular allegation, it doesn't involve any
23 use of tasers. I'm more interested in the training
24 that was provided to your officers on use of force
25 with their hands, you know, putting --

1 A. Uh- --

2 Q. -- yo- --

3 A. -- -huh.

4 Q. -- -ur hands on somebody.

5 So how would an officer be trained in that
6 your administration? Where would they get that
7 training from?

8 A. We would do it. We would do it in-house.

9 Q. Okay. Is that like through a state
10 program, or is that just from Hinds County
11 on-the-job training?

12 A. Both.

13 Q. Okay. Do all -- the corrections officers
14 that were working in the adult detention facility
15 under your administration, did they have to pass
16 some type of like minimum standards state
17 certification?

18 A. No. They just had to go through the
19 training itself. They would have to do that.

20 Q. Where was that training offered?

21 A. Raymond Detention Center, in our classroom
22 training.

23 Q. By whom was it offered?

24 A. Lieutenant Terry Miller.

25 Q. All right. And that -- and he's an

1 employee of the Hinds County Sheriff's Department,
2 or was?

3 A. He was when I was there.

4 Q. All right. Is there any part of -- and I
5 know I've asked you a version of this before, but
6 maybe I'll ask it a different way. Is there any
7 part of the Department of Justice investigations and
8 findings that you, as the sheriff, found or believed
9 to be, "Look, this is simply not true"?

10 MS. RILEY: Objection.

11 You can answer, if you remember
12 everything in that report that you don't
13 have.

14 A. You have asked me that, but, no, I don't
15 remember it.

16 Q. (By Mr. Carr) Say that again --

17 A. I --

18 Q. -- Sheriff.

19 A. -- I don't remember it.

20 Q. Okay.

21 A. But I didn't disagree with anything in
22 their findings.

23 Q. Okay. Okay. As the sheriff of Hinds
24 County -- former sheriff of Hinds County, you are
25 the chief policymaker for the sheriff's department,

1 correct?

2 A. Yes.

3 Q. I mean, I understand you go to the board of
4 supervisors to ask for your budget. But, other than
5 that, the board of supervisor doesn't make policy
6 for your sheriff's department; you do, as the
7 elected sheriff, right?

8 A. Correct.

9 Q. Okay. And you did that during your
10 administers from January of 2016 until you left
11 office in December of 2019, correct?

12 A. Correct.

13 MR. CARR: Let's go off the record just
14 for a second.

15 MS. RILEY: Okay.

16 (Off the record.)

17 MR. CARR: Let's get back on then.

18 Sheriff, I appreciate your time, and I
19 believe that's all the questions I have for
20 you today, sir.

21 Thank you.

22 THE WITNESS: Okay. Thank --

23 MS. RILEY: Thank --

24 THE WITNESS: -- you.

25 MS. RILEY: -- you.

1 No questions.

2 (Deposition concluded at 2:07 p.m.)

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

CERTIFICATE OF DEPONENT

I, Victor Mason, deponent in this deposition, hereby certify that I have examined the foregoing 20 pages and find them to contain a full, true, and accurate transcription of the testimony as given by me on October 2, 2020, via Zoom.

Page	Line	Correction (If Any)
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

This the _____ day of _____, 2020.

VICTOR MASON

State of Mississippi

County of _____

Sworn to and subscribed before me, this the _____ day of _____, 2020.

NOTARY PUBLIC

MY COMMISSION EXPIRES _____

CERTIFICATE OF COURT REPORTER

I, Courtney R. Taylor, Court Reporter and Notary Public in and for the County of Bolivar, State of Mississippi, do hereby certify that the foregoing 20 pages, and including this page, contain a true and accurate transcription of the testimony of Victor Mason, as taken by me in the aforementioned matter at the time and place heretofore stated by stenotype and later reduced to typewritten form under my supervision by means of computer-aided transcription.

I further certify that under the authority vested in me by the State of Mississippi that the witness was placed under oath by me to truthfully answer all questions in this matter.

I further certify that I am not in the employ of or related to any counsel or party in this matter and have no interest, monetary or otherwise, in the final outcome of this proceeding.

Witness my signature and seal this the 14th day of October, 2020.

COURTNEY R. TAYLOR, CCR #1668

My Commission Expires: August 19, 2023

Victor Mason - October 02, 2020

-	advice 8:1	case 6:10	created 10:25
-ection 9:15	Affairs 6:7,13,17	Center 8:13 9:2 11:16, 20,25 13:5 17:21	D
-huh 17:3	age 12:17	certification 17:17	December 5:21,22 6:3,18 10:15 19:11
-is 13:19	agencies 12:5 14:8,15, 18	certified 11:15,19,23	department 7:4 8:10, 25 10:11 14:19,21 15:5 18:1,7,25 19:6
-ur 17:4	agency 14:10,12,22	charge 7:5	deposition 4:19 5:8 20:2
1	Agreed 4:5,6	chief 18:25	depositions 4:22 5:3, 7
12 15:8	allegation 6:18 15:13 16:22	chronic 12:8	describe 11:8 16:10
16 8:6	alleged 6:22,23	civil 8:10 10:11 11:6	designed 16:8
19 5:22 10:15	alleges 6:24	claim 6:5	detailed 8:11
2	Amendment 12:22	classroom 17:21	details 13:25
2015 15:17	annunciate 13:7	clear 15:8 16:21	detention 8:13 9:2 11:9,16,20,25 12:4 13:5 17:14,21
2016 5:19 7:13 19:10	arrested 13:23	Clinton 14:21	determine 7:10
2017 6:3,18	assigned 6:7,8	Coahoma 5:17	deterrent 16:9
2019 7:13 19:11	assisted 14:18	come-along 16:17	disagree 18:21
28 6:18	attorney 4:14	complaint 6:9	division 8:10 10:12
28th 6:3	avoided 5:24	compliance 8:24 9:5, 11 10:11,16 11:6 12:10	documents 6:5
2:07 20:2	B	concluded 20:2	DOJ 10:7 15:9
4	back 19:17	conditions 9:1	door 12:12
400 11:19,23	background 12:4	conduct 14:4,8,10,16, 23	draft 7:7,10
400-plus 11:12	believed 18:8	conducting 8:12	duly 4:8
A	board 19:3,5	confirm 4:2	E
ability 7:2	Bolivar 14:9	consistent 7:22	earlier 8:9
actual 15:6,11,14	booking 13:21	contraband 13:15,16 14:3	efforts 10:10 13:14,24 15:20,22
added 16:18	boys 12:25	control 13:15,16	Eighth 12:22
addition 12:7	bring 14:7,9	correct 5:23 6:19 8:1, 8,16,17 10:12,13 11:16,17 19:1,8,11,12	elected 19:7
administer 4:3	bringing 14:22	corrections 11:15,19, 24 14:19 15:1 17:13	employee 18:1
administers 19:10	budget 9:6 11:19,22 14:3 19:4	counsel 4:2	employees 13:22 16:11
administration 8:14 17:6,15	bunch 12:25	County 4:15 5:18 8:13 9:1 11:13,15,20,24 13:5 17:10 18:1,24	end 5:10,20 7:13
adult 8:13 9:1 11:16, 20,24 13:5 17:14	C	court 4:1 5:11	
	capacity 4:16 5:1	crack 14:2	
	Carr 4:5,10,14 7:18 8:5 9:8,21 10:3,20 12:7 18:16 19:13,17		

Victor Mason - October 02, 2020

ended 5:19	good 5:15 12:25	involving 8:14	Mike 4:14
entrance 13:21	group 14:20	issued 8:11	Miller 17:24
especial 7:7	guess 11:3		mind 12:10
EXAMINATION 4:10	guys 16:6	J	minimum 17:16
examined 4:8		jail 12:12,21 13:16	Mississippi 14:19,20
expect 5:1	H	14:12,16 15:25 16:8	money 11:2
experience 7:16	hands 16:12,25 17:4	jailers 11:9	months 8:9
F	happened 6:2 10:6	January 5:19,20 8:6	N
facilities 12:18	harm 12:21 13:6 15:7, 14	19:10	Neal 4:15 6:23,24
facility 17:14	hearing 13:3	Justice 8:11,25 15:6	Neal's 6:18
fact 13:13	highway 12:24 13:1	18:7	noise 12:23 13:2
failed 12:21 13:5	14:20	K	number 11:14 16:6
fair 5:13,14 7:18 11:18	Hinds 4:15 5:18 8:13	kind 16:14	O
12:6	9:1 11:13,15,20,24	knew 14:6	
familiar 8:18,19 15:10	13:4 17:10 18:1,23,24	L	oath 4:4
filed 4:15	hire 13:9	lawsuit 4:15	Obj- 9:13
finding 15:13	holds 16:17	left 10:14 13:13 19:10	object 9:3,19
findings 9:10,20 10:12	Hundreds 4:24	legal 7:25	objected 9:10,24
11:6 18:8,22	I	letter 8:11,18,21 15:11	Objection 7:14 8:2
fit 7:20	imagine 4:21	Lieutenant 17:24	10:1,17 12:1 18:10
flush 10:20	improper 15:7,15	lock 12:12	offered 17:20,23
force 6:22,23 7:10	improve 9:1	locks 12:12 13:12	office 8:6 10:15 11:4
15:7,15,21 16:1,3,12, 24	in-house 17:8	looked 6:19	12:24 19:11
format 5:8	incident 6:2,10,22	lot 11:2 13:2	officer 17:5
formulated 7:12	increase 11:14	loud 12:23,25	officers 4:17 6:24
found 11:23 12:20 13:4	independent 6:21	M	11:10,15,19,24 15:1
15:6,24 18:8	14:10	made 9:10 10:10 12:4	16:1,19,24 17:13
Friday 13:1	individual 4:17	make 7:3 13:14,15	ole 12:25
front 8:22 13:21	influx 13:16	19:5	on-the-job 17:11
fully 10:19	interested 16:23	making 13:1	Operations 14:20
G	Internal 6:6,12,17	manpower 14:24 15:4	opportunity 6:4
general 7:7	investigation 8:12,19,	marshall 14:10	orders 7:7
generally 8:23 10:8	20 12:20 13:4	Mason 4:7,12,13 5:16	organization 7:6
Give 13:25	investigations 18:7	Melvin 4:14 6:22,24	outnumbered 16:7
	investigator 6:7		overnight 10:22 11:1
	involve 16:22		

Victor Mason - October 02, 2020

P	Q	18:10 19:15,23,25 run 13:1	sworn 4:8
p.m. 20:2	question 5:10 7:14 8:2 11:3	S	T
pandemic 5:24	questions 4:18 5:9 19:19 20:1	safe 15:25	takedown 16:17
paper 6:5		searches 13:20	talk 5:12
part 18:4,7	R	shakedown 14:23 15:2	tasers 15:20 16:18,23
pass 12:3 17:15	Raymond 17:21	shakedowns 14:4,8, 11,16	term 5:16 12:9
past 7:16	read 6:9,12 15:11	sheriff 4:17,21 5:17,24 7:2 8:24 9:9 12:9,23 14:17 16:11,21 18:8, 18,23,24 19:7,18	Terry 17:24
Patrol 14:20	recall 6:14	sheriff's 7:3 10:10 18:1,25 19:6	testified 4:9
pay 12:5	recently 15:11	sheriffs 5:3	th- 13:17
people 11:9 12:3 15:23 16:2,5,8	recollection 6:21	simply 18:9	things 11:1,4 16:17
perform 15:1	record 4:11 15:8 19:13,16	sir 4:11,18 14:17 19:20	time 8:14 10:14 14:17 19:18
period 8:14	recruit 11:10	sit 9:9	today 4:18 5:12 9:9 19:20
physical 16:16	recruiting 15:23	situations 10:6	told 10:4
physically 15:21	referencing 15:8	Special 14:20	tools 7:9
pipes 12:25	remedy 13:8 15:13	specifics 8:21	train 16:11
point 14:6	remember 18:11,15, 19	staff 13:9 15:15,17,18	trained 17:5
Police 14:21	repair 12:11	Staffing 11:7,9	training 7:23 15:20 16:14,15,17,23 17:7, 11,19,20,22
policies 7:7 14:2	repaired 13:12	standards 7:22 11:11 17:16	trouble 13:2,3
policy 7:3,11,19 19:5	repairing 13:13	started 5:19 13:13	true 18:9
policymaker 18:25	report 6:13,17,19 10:7 13:19 15:9 18:12	state 4:11 17:9,16	trust 15:1
power 7:3	reporter 4:1 5:11	step 15:22	tweak 7:20
predecessor 7:19 8:15	reports 6:10	stepped 13:20,23 15:19	type 17:16
predecessors 14:2	requested 9:22	steps 13:7 15:12	U
present 4:2	requests 10:12	stipulate 4:3	U.S. 8:10,25
prisoners 12:21 13:6 15:6,14	requirements 8:25	strike 10:9	Uh- 17:1
problem 10:25 12:11, 15	respond 5:11	suffered 15:6,14	Uh-huh 14:7
problems 11:7 12:8,16	review 6:4 7:19	supervisor 19:5	unable 12:9
program 17:10	reviewed 8:4	supervisors 19:4	unannounced 14:5
protect 12:21 13:5	revise 7:20		understaffed 16:1
provided 16:24	rights 8:10 10:12 11:6		understaffing 12:8
put 16:12	RILEY 4:6 7:14 8:2 9:3, 13,15,18 10:1,17 12:1		understand 5:6 9:23 10:21 19:3
putting 16:25			

undone 11:5	
V	
version 18:5	
versus 14:1 16:1	
Victor 4:7,12	
videoconference 4:4	
W	
wait 5:9	
wanted 9:6 11:11 16:19	
warden 14:6	
week 14:5	
weekly 14:4	
wondering 10:6	
work 5:7	
working 7:17 17:14	
Y	
y'all 13:7 15:13	
year 5:20,21	
yo- 17:2	
Z	
Zoom 5:8	